

Appl. No. 10/730,233

Reply to Office Action of January 25, 2005

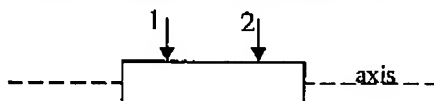
Remarks

Applicants acknowledge receipt of the Office Action dated January 25, 2005 in which the Examiner rejected claims 1-6, 11, 12, 15-19 and 24 as anticipated by Simpson (US 5,649,603), and indicated that claims 7-10, 13, 14, 20-23, 25, and 26 would be allowable if placed in independent form. Applicants have amended the claims and respectfully traverse the rejection for the reasons set out below.

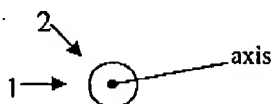
Context

Before discussing the amendments, Applicants would like to briefly highlight the nature the phrases that are used in the present claims, in order to facilitate an understanding of the arguments presented below.

- "along the length of the robot" refers to distance from one end of the robot as shown below



- "azimuthal position" refers to angular position around the axis of the robot, as shown below



Rejections under 35 U.S.C. § 102

To overcome the rejection of claims 1-6, 11, 12, 15-19 and 24 as anticipated by Simpson US 5,649,603, claims 1 and 15 have been amended to require that each of the pitched wheels is positioned at a different point along the length of the robot. This limitation does not constitute new matter, as it echoes original claim 2 and the embodiments shown in Figures 8-14. When the pitched wheels do not share an axial location, the tool is more versatile, as some obstructions can be avoided by allowing the robot body to shift away from the affected wheel. By contrast, when two or more wheels are present at a single position along the length of the robot, as taught in the references, the robot is constrained in the degree to which it can get past obstacles.

While Simpson teaches a device having sets of wheels at different locations along the tool axis, each wheel in Simpson shares its axial position with at least one other wheel and Simpson

Appl. No. 10/730,233
Reply to Office Action of January 25, 2005

neither teaches nor discloses a device having each wheel at a different axial position. Applicants therefore respectfully submit that claims 1 and 15 as amended and the claims that depend from them are allowable over the art of record.

Claim 3 has been amended to clarify the limitation that is intended to be recited there. The present amendments to claim 3 do not affect its scope.

Allowable claims

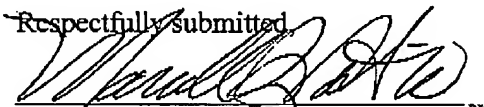
Claims 7 and 20 have been amended to incorporate the limitations of the claims from which they formerly depended and are therefore in condition for allowance, along with claim 8-10 and claims 20-23.

Claims 13 and 14 have not yet been amended because Applicants believe they are entitled to broader claims, but Applicants reserve the right to place claims 13 and 14 in independent form in a later response if necessary.

Conclusion

Applicants appreciate the Examiner's thoroughness on the present application. Applicants respectfully request that the Examiner's consider the foregoing amendments and arguments, and withdraw the rejections and allow all of the pending claims. If the Examiner has any questions or comments regarding the foregoing, he is encouraged to telephone the undersigned at (713) 238-8043.

Respectfully submitted



Marcella D. Watkins

Reg. No. 36,962

CONLEY ROSE, P.C.

P. O. Box 3267

Houston, Texas 77253-3267

(713) 238-8000

ATTORNEY FOR APPLICANT